

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
vs.)	
)	No. 4:21CR220 HEA
BILLIE LLOYD,)	
)	
Defendant.)	

**DEFENDANT’S SENTENCING MEMORANDUM AND REQUEST FOR A
NONCUSTODIAL SENTENCE**

Billie Lloyd is a hard worker. She is also a source of support and love for her children, her parents, and her friends. However, in the past few years her drug addiction has immensely interfered with these qualities and even caused her to commit this crime. She was using meth daily, lost a good job as a custodian, and eventually began to make counterfeit bills. Her addiction still haunts her – she has struggled while on bond, but completed in patient treatment and is making strides toward sobriety.

She is working full-time at a hard job where she earns very little and living in a stable environment with her parents. She is giving as much time to her children as possible. Because of her hard work from 2017 to 2019, her supervisor would like to have her reinstated as a custodian after she proves herself. *See* attached letters. While Ms. Lloyd has misdemeanor driving convictions, she has no serious criminal history and is not a danger to the community while maintaining her sobriety.

If allowed to continue with her rehabilitation, Ms. Lloyd has the work ethic and the family support to achieve her goals and the goals of sentencing, including paying her restitution.

Conclusion

WHEREFORE, Billie Lloyd requests this Court impose a non-custodial sentence of time-served and supervised release or probation and allow her to continue her rehabilitation.

Respectfully submitted,

/s/Brocca Morrison
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Assistant United States Attorney and the United States Probation Office.

/s/Brocca Morrison
BROCCA MORRISON
Assistant Federal Public Defende